

EXHIBIT 1

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10 Attorneys for Defendant
SC MARKETING GROUP, INC.
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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 CELLULOSE MATERIAL SOLUTIONS, LLC,)
16 Plaintiff,)
17 v.)
18 SC MARKETING GROUP, INC.,)
19 Defendant.)
20)
21)
22)

CASE NO.: 3:22-cv-03141-LB

**DECLARATION OF SALVATORE
CARDINALE IN SUPPORT OF SC
MARKETING GROUP, INC.'S
MOTION FOR SUMMARY
JUDGMENT**

Judge: Hon. Laurel Beeler
Date: TBD
Time: TBD
Location: TBD

23 I, Salvatore Cardinale, declare as follows:

24 1. I am over eighteen (18) years of age. I am the owner, President, and Chief
25 Executive Officer of defendant-counterclaim plaintiff SC Marketing Group, Inc. (dba Thermal
26 Shipping Solutions "TSS"). I submit this Declaration in support of TSS's notice of motion and
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1 motion for summary judgment. I have personal knowledge of the facts set forth herein and, if
2 called as a witness, could and would testify competently thereto.

3 2. I have been the owner, President, and Chief Executive Officer a predecessor of TSS
4 since I founded the company in March 2008.


5 3. For over a decade, I have been inventing and commercializing eco-friendly
6 packaging solutions. I developed the idea of using a polyethylene terephthalate ("PET") batt with
7 PET liners on both sides for packaging perishables, but I required a manufacturing partner to
8 create a refined finalized product. Through TSS, I therefore entered an informal partnership with
9 Cellulose Material Solutions, LLC's ("CMS") in April 2015 to manufacture a recyclable thermal
10 box liner. Eventually, the relationship ended in late 2015.

11 4. I then worked with other manufacturers to produce the current RENEWLINER
12 thermal box insulation product. The other manufacturers with whom TSS has partnered on the
13 RENEWLINER product since 2016 are Turner Fiberfill, Inc.; Taylor Nonwovens; American
14 Nonwovens, Inc.; VFT, Inc.; Fibrix, LLC; MidWest Nonwovens, LLC; and Carlee Corporation.

15 5. TSS began selling the RENEWLINER product by at least as early as February 23,
16 2016. There have been no material changes to the RENEWLINER product since it was first sold
17 in 2016.

18 6. TSS and CMS now directly compete in the packaging insulation industry. Our
19 competitors include paper-based insulation, Styrofoam, compostable plastics, and numerous other
20 materials.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct. Executed on January 13, 2024 in Novato, California _____.

23
24 By: 
25 Salvatore Cardinale
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